

UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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2005 NOV 23 P 2: 28

Albert William Bleau Jr.

Plaintiff

U.S. DISTRICT COURT
DISTRICT OF MASS.

Vs.

Civil Action
No. 04 – 10469REK

Greater Lynn Mental Health
& Retardation Association, et al,

Defendants

**Motion Of Plaintiff Albert W. Bleau Jr. To Expand Discovery
To Include All Present and Past Board Members And Relevant Sub-
Contractors and Senior Managers of the Former Eastern Mass Housing
Corporation and Greater Lynn Mental health & Retardation Association Now
Named Bridgewell, Inc.**

Plaintiff Albert W. Bleau Jr. is proceeding to begin Discovery on his claims for Breach of Contract, Defamation and ADA.

Plaintiff Albert W. Bleau Jr. respectfully requests to expand discovery to include all present and past Board Members and relevant sub contractors and senior managers of the former Eastern Mass Housing Corporation and Greater Lynn Mental health & Retardation Association now named Bridgewell, Inc.

The expansion of discovery to include additional individuals over and above the ten allowed in Rule 26.1 is essential for the plaintiff to prove his claims under ADA, Defamation and Breach of Contract.

There are five defendants in this complaint including two corporations that have six or more board members. The board composition has changed from 1099 through 2004. Additionally, GLMHRA is a large corporation with over seven hundred employees and subcontractors.

The plaintiff expects to either depose or issue written letters or interrogatories to defendants MacKleish, Sherman and Griffin; past Executive Director, Paul Cote; the current Executive Director, Robert Sterns; GLMHRA senior management employees: Administrative Director, James Cowdell; Director of Operations, Elaine White; Mental Retardation Director, Kelly Johnson; Human Resource Director, Susan Villet and Fiscal Manager, Terri Kasper ; and former senior management employees: Director of Quality Assurance and Contracts, Janine Brown Smith; the former Human Resource Director, Anne Perry; the former Director of Training & Mental Health Services, Deborah Clemente and the former Chief Financial Officer Mr. Jeff Bransfield.

Additionally, the plaintiff will need to either depose or issue written letters or interrogatories to EMHC auditor, Tim Demakis, GLMHRA auditors James Mecone and John Sanella.

The plaintiff will also need to either depose or issue written letters or interrogatories to former prospective employers, news sources and former prospective clients who received defaming information from the defendants. Specifically, the plaintiff will conduct discovery with the editor of the Lynn Daily Item, Alan Kort; the past Editor of the North Shore Sunday newspaper; Gerald Morrissey, Commissioner for the Department of Mental Retardation; Mary Lou Sutter, past Mental Health Commissioner; Art Brady, Executive Director of the Alternative Workshop, Inc.; Gerry McCarthy, Executive Director, of the North Shore Association for Retarded Citizens, Inc.; Richard Cassetta, Executive Director, of Work Inc.; the Human Resources Director at the May Institute and Michael Walsh, Human Resource Director, of the Kennebec Valley Mental Health Center in Maine and at least three additional Human Resource Director's, of the more than one hundred additional companies solicited by the plaintiff for employment or business from November 8, 2000 to the present.

The plaintiff will also need to either depose, issue written letters or interrogatories to all past and present board members of GLMHRA and EMHC from November 8, 2000 to the present totaling approximately 25 members.

Respectfully submitted,

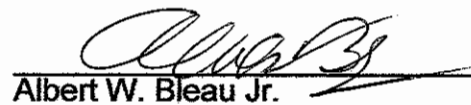


Albert W. Bleau Jr.
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Dated: November 23, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail on November 25, 2005.



Albert W. Bleau Jr.